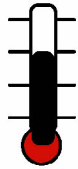


3.0 Concept of Gas Emergency Operations



3.1 Levels Of Emergency

PG&E has adopted four levels of emergency response to ensure a consistent and well coordinated response to emergencies by all departments and business units. The levels are based primarily on the resource requirements to respond to the emergency and impacts on customer service. Classification of emergency levels are not function specific. A storm and ensuing flooding that results in multi-area electric outages and one small gas system shutdown would constitute a Level 3 or higher emergency, even though the impact on the gas facilities are minimal.

3.1.1 Level 1 - Local Emergency

A local emergency involving a small number of customers which is generally handled within the geographic area with minimal impact on Call Center operations and limited, if any, media or governmental interest. The duration of the event is usually fairly short, i.e., less than 12 hours. Responsibility for managing this emergency will generally be at the first line supervisor level.

Examples: routine dig-ins; response to customer smell of gas calls; small, localized gas outage requiring local Gas Service Representative(s) to restore service, Stage I non-core customer gas curtailment.

3.1.2 Level 2 - Area-Wide Emergency

An area-wide or high profile emergency involving a large number of customers and/or requiring construction or other resources from outside the impacted organization but still within the affected area boundaries. The Call Centers may augment staffing and/or extend hours of coverage, utilize technology such as IVRU, 21st Century, etc., and may activate the Credit and Records Center as a Call Center. This level of emergency will generally result in increased media and/or governmental interest and may impact multiple major customers. Distribution reported emergencies will result in the activation local Operations Emergency Center (OEC). A gas transmission emergency will require the activation of the Pipeline Restoration center (PRC). The duration of this event is usually expected to be in excess of 12 hours. Responsibility for managing this level of emergency will vary based on the emergency. Emergencies which are distribution related will be managed by the Area M&C director with the support of Customer Service. If an emergency is caused by the failure of a gas transmission facility managed by UO (gas distribution), the affected HQ-M&C organization will assume responsibility for managing the emergency as described in the existing Memorandum of Understanding (MOU) with Gas Transmission.

Examples: gas outage where out of HQ personnel assist local HQ personnel with service restoration; gas transmission main rupture repair requiring out of HQ certified welders (available from Title 300 HQ's, other HQ or districts), Stage II non-core customer gas curtailment.

3.1.3 Level 3 - Multi-Area Emergency

A multi-area emergency involving large numbers of customers and requiring the movement of construction and other business unit resources across area boundaries, as well as resulting in customer inquiries to the extent that Call Center Operations may be required to activate the Call Center Emergency Coordination Center (CCECC), and utilize additional Call Center support options. This emergency is expected to result in extensive inquiries from major media organizations, including some at the national level, as well as county and state agencies. This event is expected to last for two or more days, but can be of shorter duration particularly in widespread outage situations. At this level of emergency, the Operations Coordination Center (OCC) is activated and assumes responsibility for managing the emergency. The only exception is where there are only system-wide gas curtailments due to conditions outside the PG&E service territory, which are managed by System Gas Control. The Senior Director-M&C and the Director of Electric Control Center Operations are responsible for the operation of the OCC.

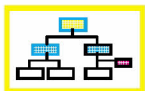
Examples: System-wide gas curtailment due to conditions outside the PG&E service territory, major gas transmission outages, Stage III non-core customer gas curtailment.

3.1.4 Level 4 - Company-Wide Emergency

An emergency which impacts the Company's and/or our customers' ability to conduct normal business functions and requires the full mobilization of Company resources to respond. Other factors could include an emergency requiring extensive cross-business unit prioritization of resources, or one which causes extensive inquiries from customers, the media or governmental agencies. The Sr. VP/GM-ED is responsible for managing Level 4 Emergencies with the support of the Corporate Emergency operations Center (EOC).

Example: An urban earthquake.

3.2 Company Emergency Management Organizations



This section provides a general description of the organizations responsible for managing Level 3 and 4 emergency response activities. The UO Electric Emergency Operations Plan provides a more detailed and comprehensive description of the Company Emergency Management Organization.

The vast majority of gas emergencies are handled at the local level. In many cases, HQ and operating departments coordinate among themselves or with General Office departments to resolve emergencies in the most effective manner. The OCC is activated for Level 3 and 4 Emergencies, and the EOC is activated for Level 4 Emergencies. The OCC manages Level 3 and the EOC manages Level 4 Emergencies.

The M&C Area Director, through the OEC, is responsible for managing distribution emergencies within their assigned area. As appropriate, the OEC coordinates with General Office departments and, in particular, Gas Engineering, Public Relations, and the Call Centers.

When the OCC is activated, the HQ, through the OEC (PRC for Gas Transmission), is responsible for reporting system status information to the OCC on a periodic basis. This information generally includes the number of customers out of service and the number of customers that have been restored (both gas and electric), major facilities impacted, personnel and equipment requirements, and estimated restoration time.

The VP-Gas Transmission and Distribution and the affected area manager are responsible for responding to emergencies that affect the gas transmission system. In response to these emergencies, they coordinate with the Gas Control Centers or, if activated, the PRC, as well as other affected organizations. When the gas emergency requires OCC activation, the OCC coordinates personnel and equipment requests, and other technical support.

3.2.1 Operations Emergency Center (OEC) (Levels 2-4)

During Levels 2-4 Emergencies, affected HQ activate a OEC comprised of multiply departments and other business units, when indicated, to manage and coordinate emergency response and service restoration efforts within its service boundary. In fulfilling this role, the OEC deploys, monitors, directs, and coordinates the personnel necessary to assess damage, secure hazardous situations, restore service, and communicate up-to-date distribution system status information to the CTCC, OCC, and other activated coordination centers. For a more detailed description of the roles and responsibilities of the OEC, see the OEC Operating Procedures in the Area Headquarters Electric Emergency Plan.

An OEC is activated for Level 2 emergencies, and for other emergencies deemed necessary by the Emergency Response Coordinator (ERC). During a Level 3, the OCC is activated and all OECs are activated (although some may be a partial activation). Activation levels can range from an emergency supervisor's call for advice to all department representatives responding to the OEC.

Local operating departments' gas emergency plans should establish the following:

- Departments that should be involved
- Department roles
- Notification procedures

The OEC establishes local gas emergency response priorities and implements gas system priorities as directed by the OCC. The OEC gathers the data needed to coordinate gas system response and gas restoration priorities. Some of the information required by the OCC includes:

- Number of customers without service
- Major customers without service
- Number of customers restored
- Facilities affected
- Damage assessment
- Personnel allocations
- Additional personnel needed
- Estimated time of restoration

The location and custodian of the OEC activation and operation procedures are to be in Appendix E-5.

3.2.2 Pipeline Restoration Center (PRC) (Levels 2-4)

The PRC, located in Walnut Creek, serves as a central point for coordinating and supporting response to Level 2-4 gas transmission emergencies. In this capacity, the PRC coordinates with System Gas Control, OECs, the OCC, and other emergency management organizations. During Level 3 and 4 emergencies the PRC will request out-of-area crews and/or mutual aid leak surveyors from the OCC. During Level 2-4 local gas transmission emergencies, as described in the CGT MOU, the local OM&C Area operating groups will make the situation safe. The CGT MOU (Section 2.6.1 and Appendix B-2 in the local Area OM&C gas emergency plans) describes the process for managing local gas transmission emergencies. The local Area OM&C operating groups will coordinate gas service restoration. During Level 3 and 4 Emergencies, the PRC provides regular gas transmission system status reports to the OCC.

The role of the CGT Emergency Response Coordinator (ERC) is to manage emergency response efforts through the PRC.

Local gas emergency plans (CGT only) must include the following:

Activation criteria

Departments that should be involved

Department roles Notification procedures

3.2.3 Operations Coordination Center (OCC) (Levels 2-4)

The OCC is located in San Francisco (alternate in San Ramon) and consists of multiple departments and business units working together to gather, consolidate, analyze and disseminate system-wide status information, and to allocate resources, as necessary, or as directed by the EOC to ensure an effective gas emergency response throughout the Company's service territory. The OCC manages Level 3 Emergencies and is opened (possibly only partially) for support for Level 2 Emergencies.

The OCC acquires and coordinates all resources for deployment between HQ and areas as necessary to provide for the safest and most efficient restoration effort. The OCC also communicates, on a consistent basis, the status of the gas emergency response, including personnel and equipment deployment, customer restoration status, call volumes, and facility impacts to senior management, the Corporate EOC when activated, and to OECs, other coordination centers and restoration centers involved in the gas emergency response.

The VP-OM&C has overall responsibility for the OCC.

3.2.4 Company Emergency Operations Center (EOC) (Level 4)

The Company EOC, located in San Francisco (alternate in San Ramon) is activated for and manages all Level 4 emergencies and is responsible for assessing the overall extent and impact of the gas emergency; developing an overall response strategy; providing the OCC and other coordination centers with policy direction; and coordinating, on a Company-wide basis, resources and information needed to support the impacted HQ and areas. The EOC reports system status and information to the Operations Group of the Corporate EOC.

The Sr. VP/GM-UO has overall responsibility for managing the EOC.

3.2.5 System Gas Control (SGC)(24 hour activation)

System Gas Control located in San Francisco, provides central monitoring of the gas transmission system. SGC directs the actions to be taken by the Gas Control Centers. An alternate SGC is located in Antioch.

3.2.6 Gas Control Centers (GCC)(24 hour activation)

There are two Gas Control Centers (Brentwood and San Jose) which operate on a 24-hour basis. Each GCC is responsible for monitoring and controlling a portion of the gas transmission system under the direction of SGC. Brentwood GCC covers the following Divisions: Diablo, Fresno, North Bay, North Coast, North Valley, Sacramento, Sierra, Stockton, and Yosemite. San Jose GCC covers the following Divisions: Central Coast, DeAnza, East bay, Kern, Los Padres, Mission Peninsula, San Francisco, and San Jose.

3.2.7 Other Emergency Management Organizations

The following emergency management organizations may also be involved in gas emergency response:

- Human Resources Coordination Center (HRCC), only during level 4
- Computer & Telecommunications Restoration Center (CTRC)
- Facilities Coordination Center (FCC), only during level 4
- External Communications Coordination Center (EXCCC)
- Call Center Emergency Coordination Center (CCECC)
- Materials and Fleet Coordination Center (MFCC)

3.3 Personnel Roles and Responsibilities



In a gas emergency, all employees have the responsibility and authority to take all necessary steps to safeguard the public from imminent danger including, but not limited to, shutting customers and systems down.

While most emergencies allow enough time to assess and develop an action plan specific to the incident, respondents must recognize whether shutdown should occur before an action plan is activated.

The specific duties of classifications that assess, develop, and implement response plans are defined below. These are the most common classifications involved in gas emergencies. This list does not preclude other classifications from the requirements of this Plan.

3.3.1 Customer Service Representative

The customer services representative is generally the first company representative to be notified of gas emergencies. The CSR has four distinct responsibilities in handling these calls:

- Recognize calls that need immediate response (*See section 2.3.1*)
- Correctly advise the customer how to safeguard against potential hazards as outlined in the DCS policy statement on Excellent Service

- Ask the customer for information that could help assess the situation and develop an appropriate response—use skilled questioning, call handling process maps, call guides, and the bullet help list
- Transmit a tag to service dispatch—then call to be sure the tag is received and recognized as an "immediate response" tag

See the Call Center Operations Gas Emergency Plan for more detailed information.

3.3.2 Service Operator (SO) or Distribution Operator (DO)

The service operator (SO) or distribution operator (DO) dispatches the appropriate first responder. The SO/DO is the primary communications link between field forces, Gas Control Centers, outside agencies and emergency supervision. He/She helps gather the necessary information to assess the gas emergency. The SO/DO is the information hub and coordinates the communication of all required information. When the OEC is activated, communication to other coordination centers is from the OEC, not the SO/DO. The SO/DO must:

- Recognize an "immediate response" tag and review it to ensure that the required information is available on the tag
- Dispatch an appropriate qualified company representative to the scene—usually a gas service representative
- Identify and notify other individuals or departments as needed, including local management, outside emergency agencies (such as fire and police departments), or Safety Health and Claims, when the SO/DO is the communication coordinator
- Collect and relay information to the appropriate gas emergency response participants
- Evaluate all information for possible cause and recommend corrective action to the supervisor in charge
- Recognize incidents that may affect the operation of the gas transmission and gas distribution systems and notify appropriate personnel
- Provide information to the Call Center
- Provide CPUC/DOT reportable incident information when appropriate. See Section 4.6.

See the UO Electric Emergency Operations Plan for additional information.

3.3.3 Gas Service Representative (GSR)

The gas service representative is generally the first company representative on the scene. Their first responsibility is to protect life and property. If unable to do so, the representative must immediately call for assistance. After the area is secure, the representative assesses the situation and determines the necessary response. The GSR must:

- Respond to the gas emergency and make field assessments
- Make safe. Protect people first, then property
- Relay assessment to the SO/DO
- Correctly advise the customer how to safeguard against potential hazards as outlined in the UO policy statement on Excellent Service
- Assist and advise emergency response agencies on how to handle natural gas emergencies
- Assist other company personnel
- Perform minor repairs within the service representative position description
- Determine if the incident is reportable and help the SO/DO gather data for the report
- Relay outage information to the SO/DO for communication to the Call Center
- Prepare an Accident Report when required

3.3.4 Transmission Coordinator

The Transmission Coordinator is responsible for the continuous monitoring and operation of the gas transmission system and continuous monitoring of some distribution systems. To do this, the operator uses SCADA equipment and information relayed to the operators from representatives in the field and the service operators.

In emergencies, the operator directs all operations that affect the supply, pressure and quality of the gas on the transmission system. Any changes that affect the above, must be cleared by the Transmission Coordinator. The Gas Control Centers also act as the company relay for all information regarding curtailment of non-core gas customers. The operator must:

- Monitor alarm settings and respond with standard operating procedures
- Notify the appropriate SO/DO and emergency supervisor of obvious or potential problems
- Relay reportable incident information to the Gas Distribution & Technical Services Department. See Section 4.6 for more detailed information.
- Maintain a log of operations to record company response to emergencies
- Provide information to the Call Center

3.3.5 Transmission and Regulation Personnel

ED M&C departments and Gas System Maintenance & Technical Support districts are responsible for the maintenance of facilities that affect the flow, pressure, quality and measurement of natural gas.

During emergencies, Transmission and Regulation (T&R) personnel may operate valves, regulators and control equipment to bring the gas emergency under control and/or maintain the system at a safe working level while emergency repairs are being made. T&R employees have the authority and responsibility to take any necessary actions, including shutting down a system, to safeguard the public from imminent danger.

T&R employees:

- Respond and make field assessments
- Make safe. Protect people, then property
- Relay assessment to SO/DO or Transmission Coordinator and/or supervisory personnel as appropriate
- Correctly advise the customer how to safeguard against potential hazards as outlined in the UO policy statement on Excellent Service
- Assist and advise emergency response agencies in dealing with natural gas
- Assist other company personnel
- Relay outage information to the SO/DO for communication to the Call Center

3.3.6 Gas Construction Crew

A gas construction crew repairs damaged facilities and provides labor for emergencies such as closing riser valves during curtailments. Generally, the work that construction crews do in a gas emergency is not substantially different from their normal assignments.

In responding to a gas emergency, crew members must:

- Respond and make field assessments
- Make safe. Protect people, then property
- Relay assessment to appropriate personnel
- Correctly advise the customer how to safeguard against potential hazards as outlined in the UO policy statement on Excellent Service
- Assist and advise emergency response agencies in dealing with natural gas
- Assist other company personnel
- Determine if the incident may be reportable and gather data for the report
- Suggest method of repair to emergency supervisor or proceed on own as necessary
- Report customer outage information and anticipated time of restoration to the SO and emergency supervisor

3.3.7 Emergency Supervisor (On-Call Advisor)

The emergency supervisor (ED distribution supervisor, Customer Field Services supervisor, CGT district superintendent, etc.) coordinates all gas emergency response activities. The supervisor must be sufficiently familiar with the work processes of each department to either direct the response, or recognize the need for additional expertise. The supervisor must ensure compliance with corporate and local gas emergency response policies and priorities and ensure that all appropriate communication, both internal and external, is accomplished.

The emergency supervisor must:

- Be available during non-standard work hours
- Gather facts using informed questioning
- Assess situation and information
- Develop a response plan—who and what is required
- Implement the response plan—make safe, protect people, then property
- Communicate with all appropriate internal organizations
- Communicate with other emergency response agencies and media
- Establish a command site if necessary
- Ensure notifications are made
- Ensure information is logged—including time notified, description of incident, time employees called out, time notifications made, time customers out and restored, time employees respond, time situation is made safe, others (*See section 5.11*)
- Determine when the gas emergency is over
- Participate in post-incident critiques (*See section 5.12*)
- Complete or assist in preparing the after-action report (*See section 5.13*)
- Relinquish command to another department supervisor, if appropriate

3.3.8 Customer Field Services Supervisor

The Customer Field Services Supervisor (CFS) directs the gas service representatives. They take an active role in major service restorations.

The supervisor must:

- Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- Provide expertise and participate in the OEC
- Participate in carbon monoxide poisoning investigations

- Take over all or part of gas emergency response responsibility specific to his/her department
- Participate in post-incident critiques (*See section 5.12*)
- Complete or assist in preparing the after-action report (*See section 5.13*)

3.3.9 Distribution Supervisor (T&R)

The Gas Operations Supervisor directs the maintenance and operation of facilities that affect the flow, pressure, quality and measurement of natural gas.

The supervisor must:

- Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- Provide expertise and participate in the OEC
- Take over all or part of gas emergency response responsibility specific to his/her department
- Participate in post-incident critiques (*See section 5.12*)
- Complete or assist in preparing the after-action report (*See section 5.13*)

3.3.10 Distribution Supervisor (Construction Crews)

The Construction Supervisor directs the work of the gas construction crews.

The Construction Supervisor must:

- Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- Provide expertise and participate in the OEC
- Take over all or part of gas emergency response responsibility specific to his/her department
- Participate in post-incident critiques (*See section 5.12*)
- Complete or assist in preparing the after-action report (*See section 5.13*)

3.3.11 Title 300 Area Foreman

The Title 300 Area Foreman directs the work of Title 300 crews.

The foreman must:

- Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- Provide expertise and participate in the OEC
- Take over all or part of gas emergency response responsibility specific to his/her department
- Participate in post-incident critiques (*See section 5.12*)
- Complete or assist in preparing the after-action report (*See section 5.13*)
- Provide additional resources as required, including tapping and plugging equipment, specialized personnel, boring equipment and liaison with contractors.
- Provide expertise in T&R practices that are not routinely part of the operating department, such as transmission repair, welding, shoring, and tapping and plugging.

3.3.12 Gas System Maintenance and Technical Support (GSM&TS) District Superintendent

The Gas System Maintenance and Technical Support District Superintendent is the emergency supervisor for the operating areas within CGT.

The superintendent must:

- Maintain the department in a state of readiness through a combination of skills assessment, training, system familiarity, periodic inspections, audits and drills
- Ensure the department has access to the necessary tools and equipment to respond adequately to emergencies
- Take over all or part of gas emergency response responsibility specific to his/her department
- Participate in post-incident critiques (*See section 5.12*)
- Complete or assist in preparing the after-action report (*See section 5.13*)
- Provide expertise on gas transmission and collection

3.3.13 Headquarters Gas Engineer

The Headquarters Gas Engineer ensures that all maps, records, shut down plans and other associated records are accurate, up to date and available for all employees. The engineer may be required to perform engineering functions, such as load balance and blow down calculations for different repair options. The engineer also may train employees about maps and records, code compliance, Gas Standards and Specifications, CPUC and local notification procedures, and local operating procedures.

3.3.14 Maintenance and Construction Superintendent - Title 300

The Title 300 M&C Superintendent is responsible for gas emergency preparedness planning and training of company gas emergency response personnel within that organization. See section 3.3.20 for information concerning the Superintendent's role as the ACRC.

The Superintendent will:

- Coordinate movement of construction crews between HQ's within the Area
- Notify the OCC when moving crews across area boundaries
- Assess damage and notify the Title 200 M&C superintendent

3.3.15 Maintenance and Construction Superintendent - Title 200

The Title 200 M&C Superintendent is charged with the responsibility of gas emergency preparedness planning, training and response in the HQ and acts as the HQ contact for the OCC. The Superintendent is the primary ERC. See Section 3.3.19.

The superintendent will:

- Assess damage and notify the OCC
- Sets local repair priorities
- Guide and direct the emergency supervisor

3.3.16 Customer Field Service - Field Service and Dispatch Manager

The Customer Field Service - Field Service and Dispatch Manager is responsible for gas emergency preparedness planning and training of Company gas emergency response personnel within his/her organization. The manager also may be required to provide expertise specific to the department and participate in the OEC. He/she also manages major service restoration work in his/her HQ's.

3.3.17 Call Center Managers

The Call Center Managers are responsible for gas emergency preparedness planning and training of Company gas emergency response personnel within their organization.

3.3.18 Area M&C Directors, GT&D Director, GSO Director, Call Center Operations Director

Area M&C Directors, GT&D Director, GSO Director, and Call Center Operations Director are responsible for gas emergency preparedness planning and training of company gas emergency response personnel in their respective organizations. They are responsible for the actions and results of employees in their organizations.

In response to emergencies, Area M&C Directors and GT&D Director should ensure that they coordinate their efforts with the Call Centers as well as representatives from Public Relations, Governmental Relations, and Community Relations Departments. Managers are also responsible for ensuring that Senior Management (through the OCC) is informed in a timely manner of major emergencies including:

- Major seismic event
- Widespread fires
- Terrorist incidents or civil disruption
- Significant environmental problems
- Other significant problems

An event is deemed significant if it affects large numbers of customers, has a potential for state and/or national publicity, or poses adverse regulatory impacts.

During working hours, senior management should be notified through the OEC or the OCC. If those officers are not available after normal business hours, the Corporate Security Department is available to contact senior management. Corporate Security can be reached through the General Office Telephone Operator at 223-7000, or 415-973-7000.

3.3.19 Area OM&C Emergency Response Coordinator (ERC)

The ERC manages gas emergency response within the assigned HQ, coordinates the activities of all OEC staff, and reports to the Area M&C Director. The ERC is responsible for determining the level of response required to address a specific gas emergency; ensuring that appropriate gas emergency response personnel are activated and deployed; coordinating resource acquisition and deployment; providing information to the OCC; implementing restoration priorities established by the OCC or Company EOC; and sending resources to other HQ as requested by the ACRC/ASRC, or when directed by the OCC.

3.3.20 Area Construction Resource Coordinator (ACRC)

During Levels 2-4 Emergencies, the Title 300 M&C Superintendent assumes the role of ACRC and is responsible for coordinating movement of construction crews and leak surveyors between the HQ in the assigned area (Level 2), and between areas, in accordance with priorities established by the OCC (Levels 3 and 4).

3.3.21 Area Service Resource Coordinator (ASRC)

In Level 2-4 Emergencies, the on-call Customer Services Planning and Support representative assumes the role of ASRC and is responsible for coordinating and tracking the movement of gas service personnel between HQ in an area (Level 2), and between areas, in accordance with priorities established by the OCC (Levels 3 and 4).

3.3.22 Emergency Process Coordinator (EPC)

The EPC reports to the Electric Control Center Operations Department and is responsible for the following items within their geographic territory:

- Providing emergency response training, including
WLA/OMT/OIS/FAS
- Developing exercises/drills
- Establishing verbal agreements with community services (e.g. OES, Fire, Police, etc.)
- Responding when any OEC in the Area is activated to provide support as needed to the Area M&C Director and the ERC
- Coordinating OEC audits
- After every OEC opening and/or exercise, a critique with an Action Plan is developed and submitted to Emergency Response and placed on the EPC's shared drive
- Ensuring that all process are documented and communicated in the Area Headquarters manual
- Continuously updating key Emergency Response personnel and contact phone numbers

Refer to the UO Electric Emergency Operations Plan for additional information.

